

BOIES SCHILLER FLEXNER LLP

David Boies (*pro hac vice*)

333 Main Street

Armonk, NY 10504

(914) 749-8200

dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)

Joshua M. Stein (SBN 298856)

44 Montgomery Street, 41st Floor

San Francisco, CA 94104

(415) 293-6800

mpritt@bsfllp.com

jstein@bsfllp.com

Jesse Panuccio (*pro hac vice*)

1401 New York Ave, NW

Washington, DC 20005

(202) 237-2727

jpanuccio@bsfllp.com

Joshua I. Schiller (SBN 330653)

David L. Simons (*pro hac vice*)

55 Hudson Yards, 20th Floor

New York, NY 10001

(914) 749-8200

jischiller@bsfllp.com

dsimons@bsfllp.com

*Counsel for Individual and Representative Plaintiffs
and the Proposed Class. (additional counsel included below)*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO VISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED RE: PRIVILEGE
BRIEF**

Pursuant to Civil Local Rules 7-11, 79-5(f), and this Court's Standing Order on Motions to Seal, Plaintiffs respectfully submit this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed, filed in connection with Plaintiffs' Privilege Letter Briefing (the "Privilege Brief"). The Privilege Brief contains, in various places, summaries or descriptions of material that Defendant Meta Platforms, Inc. ("Meta"), has designated as "Confidential" or "Highly Confidential - Attorneys Eyes Only," as defined in the parties' Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (ECF No. 90, the "Protective Order"). Plaintiffs are also filing all exhibits in support of the Privilege Brief under seal because they are either designated, or refer to material that is designated, as "Confidential" or "Attorneys' Eyes Only."

Accordingly, Plaintiffs have filed a public version of the Privilege Motion to the docket via ECF, redacting references to such extracted information or summaries. Plaintiffs have also filed under seal an unredacted, highlighted version. Plaintiffs have also filed "slipsheet" versions of the exhibits in support of the Privilege Motion via ECF and will separately submit those to the Court and Meta.

Dated: November 8, 2024

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt

BOIES SCHILLER FLEXNER LLP
David Boies (*pro hac vice*)
333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)
Joshua M. Stein (SBN 298856)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsfllp.com
jstein@bsfllp.com

Jesse Panuccio (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsfllp.com

Joshua I. Schiller (SBN 330653)
David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
jischiller@bsfllp.com
dsimons@bsfllp.com

*Interim Lead Counsel for Individual and
Representative Plaintiffs and the Proposed Class.*

LIEFF CABRASER HEIMANN &

BERNSTEIN, LLP

Elizabeth J. Cabraser (State Bar No. 083151)
Daniel M. Hutchinson (State Bar No. 239458)
Reilly T. Stoler (State Bar No. 310761)
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
(415) 956-1000
ecabraser@lchb.com
dhutchinson@lchb.com
rstoler@lchb.com

Rachel Geman (*pro hac vice*)
250 Hudson Street, 8th Floor

New York, New York 10013-1413
(212) 355-9500
rgeman@lchb.com

JOSEPH SAVERI LAW FIRM LLP
Joseph R. Saveri (SBN 130064)
Cadio Zirpoli (SBN 179108)
Christopher K.L. Young (SBN 318371)
Holden Benon (SBN 325847)
Aaron Cera (SBN 351163)
Margaux Poueymirou (SBN 356000)
601 California Street, Suite 1505
San Francisco, California 94108
(415) 500-6800
jsaveri@saverilawfirm.com
czipoli@saverilawfirm.com
cyoung@saverilawfirm.com
hbenon@saverilawfirm.com
acera@saverilawfirm.com
mpoueymirou@saverilawfirm.com

CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP
Bryan L. Clobes (*pro hac vice*)
135 S. LaSalle Street, Suite 3210
Chicago, IL 60603
(312) 782-4880
bclobes@caffertyclobes.com

DICELLO LEVITT LLP
Amy Keller (*pro hac vice*)
Nada Djordjevic (*pro hac vice*)
James Ulwick (*pro hac vice*)
10 North Dearborn Street, Sixth Floor
Chicago, Illinois 60602
(312) 214-7900
akeller@dicellosevitt.com
ndjordjevic@dicellosevitt.com
julwick@dicellosevitt.com

David Straite (*pro hac vice*)
485 Lexington Avenue, Suite 1001
New York, New York 10017
(646) 933-1000
dsraite@dicellosevitt.com

Matthew Butterick (SBN 250953)
1920 Hillhurst Avenue, #406

Los Angeles, CA 90027
(323) 968-2632
mb@buttericklaw.com

**COWAN DEBAETS ABRAMS & SHEPPARD
LLP**

Scott J. Sholder (*pro hac vice*)
CeCe M. Cole
60 Broad Street, 30th Floor
New York, NY 10004
(212) 974-7474
ssholder@cdas.com
ccole@cdas.com

*Counsel for Individual and Representative
Plaintiffs and the Proposed Class.*